

Dear Members of Lemon Grove City Council and Development Services Department,

I am writing to you as an experienced local urban beekeeper and member of the San Diego Beekeeping Society, regarding your discussion of the proposed Beekeeping Ordinance this evening, May 17<sup>th</sup>. I have kept bees with my husband in small lots in various cities for a combined total of over 30 years. I would like to let you know some concerns and suggestions for solutions that I have regarding your proposed Beekeeping Ordinance.

1. In the language of amendment 4 there is a problem, an apiary is a bee yard and a hive is the bee housing placed within the apiary (much as an avocado is a fruit tree and an orchard is an area of fruit trees). If the apiary is restricted to the same size as the hive, managing the hive will be impossible. I suggest striking the word "apiary" and rewording this amendment using the concepts I have outlined below.
2. A more serious concern with amendment 4 is that Horizontal Langstroths and Top Bar hives often have a footprint of more than 3 square feet, but they are only about waist high (or lower) to a standing person. These are hives which enable disabled beekeepers in wheelchairs to keep bees despite their disability, as the frames of bees and honey are easy to reach. This proposed regulation may legitimately be perceived as undesirable discrimination against the disabled, and is therefore quite problematic. An alternative may be to use maximum dimensions for a hive, much as the airlines use for baggage, or shippers use for packages. So for example, your 3 square foot footprint and 4.5 foot height would translate to approximately 8 to 9 linear feet total. A further alternative would be to use a volume restriction, so 3 sq ft by 4.5 feet would be 13.5 cubic feet. That would be fair and non-discriminatory to disabled beekeepers.
3. The 10,000 sq ft property requirement seems unnecessarily restrictive, if the hives can be placed in compliance with the proposed property boundary distances. I think it is a great idea that this restriction will be lifted with the implementation of boundary rules.
4. The fee and permit is onerous. For example, the City of San Diego only charges \$35 for a business license. It also does not require a permit or a fee for urban beekeeping. Such permit processes and fees are more likely to deter hobby beekeepers than encourage them.
5. Informing neighbors may cause more trouble with anxiety than benefits. Many people have an irrational fear of bees, and yet they may unknowingly live with a wild colony of bees on their property for many years. Any beekeeper who has performed live bee removals has seen this situation. If the hives are not causing a problem, why do the neighbors need to be informed? I would submit that it would be more constructive to have a complaints investigation pathway, similar to that used by the County of San Diego Department of Agriculture, Weights, and Measures. Additionally a list of permitted sites could be made available for public enquiries by concerned residents. This would also potentially be less expensive to the City than writing to every neighbor in advance of issuing the permit.

Thank you for your time. I hope that you are able to take some of these ideas into account.